

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**UNITED STATES OF AMERICA**

**v.**

**KINGSLEY R. CHIN**

**No. 1:21-cr-10256-IT-1**

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL**

Undersigned counsel hereby respectfully requests this Honorable Court grant him leave to withdraw as counsel of record on behalf of defendant Kingsley R. Chin. As grounds, prior to the defendant's indictment, undersigned was replaced, and continues to be represented by successor counsel. Undersigned counsel inadvertently failed to file his motion to withdraw upon notice of successor counsel's appearance, and respectfully apologizes for any confusion this may have caused.

Upon information and belief, neither the Court nor the Government will be unduly prejudiced by the granting of this motion, and it is in the best interest of justice and effective court administration to grant the instant motion.

WHEREFORE, undersigned counsel respectfully moves this Honorable Court to permit his withdrawal as counsel of record.

Dated: January 8, 2025

Respectfully submitted,  
KINGSLEY R. CHIN  
By and through his attorneys,

/s/ R. Bradford Bailey  
R. Bradford Bailey, BBO#789589  
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**Certificate of Service**

I, Daniel C. Reilly, hereby certify that on this the 8th day of January, 2025, I caused a true copy of the foregoing *Motion to Withdraw* to be served upon all necessary parties to this matter by virtue of electronically filing the same via the CM/ECF system.

/s/ Daniel C. Reilly  
Daniel C. Reilly